

**MOHAVE CELLULAR LIMITED PARTNERSHIP**  
**ANNUAL SECTION 64.2009(e) CERTIFICATION**  
**EB Docket No. 06-36**

**Company Name:** Mohave Cellular Limited Partnership  
**Form 499 Filer ID:** 823712  
**Name of Signatory:** Daniel McCarthy  
**Title of Signatory:** President and Chief Operating Officer  
**Date Filed:** March 1, 2013

I, Daniel McCarthy, hereby certify that I am a duly authorized officer of Frontier Communications Company, the sole member company for CU Wireless Company LLC, which, in turn, is the General Partner in Mohave Cellular Limited Partnership ("Mohave Wireless" or the "Company"). In accordance with the terms of the underlying partnership agreement and acting as an agent of Mohave Wireless, I certify that I have personal knowledge that Mohave Wireless has established operating procedures that are adequate to ensure compliance with the CPNI rules of the Federal Communications Commission, codified at 47 C.F.R. 64.2001-64.2011, implementing Section 222(c) of the Communications Act of 1934, as amended.

Attached to this certification is an accompanying statement explaining how the Company's procedures ensure that Mohave Wireless is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. Mohave Wireless did not receive any customer complaints in 2012 concerning the unauthorized release of CPNI. The Company did not take any actions against data brokers in 2012.

  
Daniel McCarthy  
President and Chief Operating Officer  
Frontier Communications Corporation

February 13, 2013

**MOHAVE CELLULAR LIMITED PARTNERSHIP**  
**ACCOMPANYING STATEMENT - SECTION 64.2009(e) CERTIFICATION**  
**EB Docket No. 06-36**

In accordance with 47 C.F.R. § 64.2009(e), the following statement accompanies the officer compliance certificate and explains how the operating procedures of Mohave Cellular Limited Partnership (“Mohave Wireless”) ensure that the Company is in compliance with the Commission’s CPNI rules, as codified at 47 C.F.R. §§ 64.2001-64.2011.

1. Only authorized Mohave Wireless employees can access CPNI. Company personnel so authorized, including but not limited to customer service representatives, are trained regarding the appropriate access to, use of, and disclosure of CPNI. Failure to abide by the applicable policies and procedures is cause for discipline, up to and including termination.
2. Mohave Wireless’ managerial personnel monitor access to, use of, and disclosure of CPNI on an on-going basis to ensure compliance with the applicable policies and procedures and to evaluate their effectiveness.
3. Mohave Wireless has implemented reasonable processes and procedures to discover and protect against attempts to gain unauthorized access to CPNI and provides training on these processes and procedures. Mohave Wireless verifies a customer’s identity and authenticates the customer as authorized on the account prior to disclosing CPNI based on a customer-initiated telephone contact or a retail center visit. Mohave Wireless does not provide on-line account access. Mohave Wireless has implemented necessary processes and procedures to notify customers when certain account changes are made such as address of record or password changes.
4. Mohave Wireless has implemented supervisory processes to ascertain whether customer CPNI will be used in marketing efforts and whether customer approval for the use of CPNI, to the extent required under the Commission’s CPNI rules, has been obtained.
5. Mohave Wireless employees involved in marketing are trained as to what information is CPNI and when it may be used to market services to customers. All marketing campaigns that utilize CPNI are subject to supervisory approval. Records related to marketing campaigns that utilize CPNI are maintained for at least one year.

6. Mohave Wireless has implemented processes and procedures to prohibit the disclosure of CPNI to joint venture partners or independent contractors for the purpose of marketing communications-related services outside a customer's total services.
7. Mohave Wireless provides CMRS services. Mohave Wireless does not currently use, disclose or permit access to CPNI in a manner that requires prior customer approval. Mohave Wireless uses CPNI without customer approval solely in the provision of services to which that customer already subscribes, including the services and products enumerated in the Commission's rules as within the customer's total services, as well as those purposes enumerated in Section 222(d) of the Act.
8. Mohave Wireless has implemented processes and procedures to prevent the unauthorized release of customer call detail information. Specifically, Mohave Wireless will not release call detail information during a customer-initiated telephone call unless the customer has first been authenticated as authorized on the account such as by accurately providing the password on the account. If a customer cannot be authenticated, Mohave Wireless, at the customer's request, sends the call detail information to the customer's established address of record. If the customer is able to provide, without assistance from Mohave Wireless personnel, all of the call detail information necessary to address a customer service issue, then Mohave Wireless personnel are permitted to proceed with routine customer care procedures in relation to the provided call detail information. In addition, Mohave Wireless does not release call detail information to a customer during a retail center visit unless the customer provides valid photo identification.
9. Mohave Wireless has implemented processes and procedures to first inform federal law enforcement agencies, followed by notification to affected customers as specified in the FCC's rules, after reasonable determination of a breach of its customers' CPNI in accordance with FCC rules.